

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

JAMES AND KELARA GHAI SAR,)	
Individually and as Personal Representatives)	
and Co-Administrators of the Estate of Bijan C.)	
Ghaisar, Deceased,)	
)	Case No. 1:19-cv-1224 (CMH/IDD)
Plaintiffs,)	
)	
v.)	
)	
UNITED STATES OF AMERICA,)	
Defendant.)	

DEFENDANT’S EXHIBIT LIST

Pursuant to the Court’s Orders of January 15, 2020 (Dkt. 17), May 1, 2020 (Dkt. 34), and June 25, 2020 (Dkt. 39), Defendant United States of America, through its undersigned counsel, hereby respectfully submits the following list of potential exhibits for the trial of the above-captioned matter. Defendant reserves the right to elect not to seek the introduction of any of these exhibits at trial, and to re-arrange the numbering sequence prior to trial. Pursuant to the January 15, 2020 Scheduling Order, this list does not include exhibits that Defendant might seek to introduce as impeachment and/or rebuttal evidence. Moreover, Defendant reserves the right to use demonstrative exhibits during the testimony of certain of its witnesses in order to assist the trier-of-fact.

Defendant also reserves the right to use any exhibits listed on Plaintiffs’ Exhibit List.

//

EXHIBITS

DEX	Document Description	BEGBATES	ENDBATES
1	Certificate of Death	Ghaisar US-000898	Ghaisar-US 000898
2	Fairfax County Dispatch Recording	Ghaisar US-001116	Ghaisar US 001116
3	Tax Records of Bijan Ghaisar	Ghaisar US-002131	Ghaisar US-002142
4	Photograph of Diploma of Bijan Ghaisar	Ghaisar US-002144	Ghaisar US-002144
5	Tax Records of James Ghaisar	Ghaisar US-002147	Ghaisar US-002178
6	Medical records from Dr. Evan Jacobson	Ghaisar US-002325	Ghaisar US-002546
7	Medical Records from Virginia Commonwealth University	Ghaisar US-002576	Ghaisar US-002625
8	SCFP Autopsy Report	Ghaisar US-002628	Ghaisar US-002640
9	Park Police Use of Force Policy	US-00000030	US-00000033
10	Park Police Vehicular Pursuit Policy	US-00000058	US-00000066
11	Park Police Dispatch Recording	US-00000752	US-00000752
12	Commendations of Officer Amaya	US-00000845	US-00000873
13	Commendations of Officer Vinyard	US-00001014	US-00001027
14	Recording of Speed Limits Along Route	US-00002116	US-00002117
15	Summary of FBI Interview of Daniel Gohn	US-00002343-069	US-00002343-083
16	Summary of FBI Interview of Bryant Hartzell	US-00002343-331	US-00002343-342
17	Certificate of Analysis of the Commonwealth of Virginia Department of Forensic Science	US-00003009	US-00003010
18	Summary of FBI Interview of Jacob Sipe	US-00003011	US-00003017
19	DEA Chemical Analysis Report	US-00003553	US-00003554
20	Summary of FBI Interview of Kyle Groome	US-00003733	US-00003735
21	Summary of FBI Interview of Idean Marvastian	US-00003752	US-00003758
22	Summary of FBI Interview of Sam Yeganah	US-00003938	US-00003940
23	Summary of Attorney Proffer for Lucas Vinyard	US-00005375-122	US-00005375-127
24	Summary of Attorney Proffer for Alejandro Amaya	US-00005375-129	US-00005375-136
25	Summary of FBI Interview of Lucas Vinyard	US-00005375-154	US-00005375-180

DEX	Document Description	BEGBATES	ENDBATES
26	Report of Autopsy of the Commonwealth of Virginia Office of Chief Medical Examiner	US-00005411	US-00005434
27	Park Police Dispatch Recording	US-00006797	US-00006797
28	Medical Records from Inova Fairfax	US-00007109	US-00008557
29	Video of Incident	US-00009495	US-00009495
30	Video of Incident	US-00009496	US-00009496
31	Video of Incident	US-00009497	US-00009497
32	Video of Incident	US-00009498	US-00009498
33	Video of Incident	US-00009499	US-00009499
34	Video of Incident	US-00009500	US-00009500
35	Video of Incident	US-00009501	US-00009501
36	Video of Incident	US-00009502	US-00009502
37	Video of Incident	US-00009614	US-00009614
38	Video of Incident	US-00009615	US-00009615
39	Video of Incident	US-00009616	US-00009616
40	Video of Incident	US-00009617	US-00009617
41	Video of Incident	US-00009618	US-00009618
42	Video of Incident	US-00009619	US-00009619
43	Video of Incident	US-00009620	US-00009620
44	Video of Incident	US-00009621	US-00009621
45	Video of Incident	US-00009622	US-00009622
46	Video of Incident	US-00009623	US-00009623
47	Video of Incident	US-00009624	US-00009624
48	Video of Incident	US-00009625	US-00009625
49	Fairfax County Dispatch Recording	US-00010165	US-00010165
50	Video of Incident	US-00011274	US-00011274
51	Photograph from scene	US-00013555	US-00013555
52	Supplemental Criminal Incident Report	US-00013639	US-00013640
53	TSU Mapping	US-00013641	US-00013645
54	Photograph from scene	US-00016555	US-00016555
55	Photograph from scene	US-00016715	US-00016715
56	Photograph from scene	US-00016722	US-00016722
57	Photograph from scene	US-00016811	US-00016811
58	Photograph from scene	US-00016867	US-00016867
59	Photograph from scene	US-00016870	US-00016870
60	Photograph from scene	US-00016871	US-00016871
61	Email Re: Change in Org Chart and Area	US-00018631	US-00018633

DEX	Document Description	BEGBATES	ENDBATES
62	FBI Chain of Custody Log	US-00018730	US-00018730
63	Photograph - King Street and South Washington Streets	US-00018731	US-00018731
64	Photograph - Southbound South Washington Street at King Street	US-00018732	US-00018732
65	Photograph - King Street and South Washington Streets	US-00018733	US-00018733
66	Photograph - South Washington Street (George Washington Memorial Parkway) through Old Town	US-00018734	US-00018734
67	Photograph - South Washington Street at Jefferson Street	US-00018735	US-00018735
68	Photograph - Southbound George Washington Memorial Parkway	US-00018736	US-00018736
69	Photograph - Mount Vernon Trail Crossing at West Boulevard and Alexandria Avenue	US-00018737	US-00018737
70	Photograph - West Boulevard and Alexandria Avenue	US-00018738	US-00018738
71	Photograph - Alexandria Avenue	US-00018739	US-00018739
72	Photograph - Alexandria Avenue and Fort Hunt Road	US-00018740	US-00018740
73	Photograph - South Washington Street and Duke Street	US-00018741	US-00018741
74	Photograph - Southbound George Washington Memorial Parkway at Duke Street	US-00018742	US-00018742
75	Photograph - Southbound George Washington Memorial Parkway at night	US-00018743	US-00018743

DEX	Document Description	BEGBATES	ENDBATES
76	Photograph - Southbound George Washington Memorial Parkway at Duke Street at night	US-00018744	US-00018744
77	Photograph - South Washington Street at Jefferson Street at night	US-00018745	US-00018745

Respectfully submitted,

G. ZACHARY TERWILLIGER
UNITED STATES ATTORNEY

By: /s/
DENNIS C. BARGHAAN, JR.
Deputy Chief, Civil Division
KIMERE J. KIMBALL
MEGHAN LOFTUS
Assistant United States Attorneys
Office of the United States Attorney
Justin W. Williams U.S. Attorney's Building
2100 Jamieson Avenue
Alexandria, Virginia 22314
Tel: (703) 299-3891/3763
Fax: (703) 299-3983
Dennis.barghaan@usdoj.gov
kimere.kimball@usdoj.gov
Meghan.loftus@usdoj.gov

DATE: August 20, 2020